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12 *Counsel for Debtor*

13 Electronically Filed April 6, 2023

14 **UNITED STATES BANKRUPTCY COURT**

15 **DISTRICT OF NEVADA**

16 In re

17 CASH CLOUD, INC.,
 18 dba COIN CLOUD,

19 Debtor.

20 Case No. BK-S-23-10423-MKN
 21 Chapter 11

**STIPULATION TO EXTEND TIME TO
 22 RESPOND TO DEBTOR'S:**

**1) FOURTH OMNIBUS MOTION FOR ENTRY
 23 OF ORDER APPROVING REJECTION OF
 24 EXECUTORY CONTRACTS AND UNEXPIRED
 25 LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
 26 DISPOSAL OF CERTAIN PERSONAL
 27 PROPERTY INCLUDING SURRENDER AND
 28 TERMINATION OF THE AUTOMATIC STAY
 AND/OR ABANDONMENT [ECF 355];**

**2) FIFTH OMNIBUS MOTION FOR ENTRY OF
 29 ORDER APPROVING REJECTION OF
 30 EXECUTORY CONTRACTS AND UNEXPIRED
 31 LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
 32 DISPOSAL OF CERTAIN PERSONAL
 33 PROPERTY INCLUDING SURRENDER AND
 34 TERMINATION OF THE AUTOMATIC STAY
 35 AND/OR ABANDONMENT [ECF 358];**

**3) SIXTH OMNIBUS MOTION FOR ENTRY OF
 36 ORDER APPROVING REJECTION OF
 37 EXECUTORY CONTRACTS AND UNEXPIRED
 38 LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
 39 DISPOSAL OF CERTAIN PERSONAL
 40 PROPERTY INCLUDING SURRENDER AND
 41 TERMINATION OF THE AUTOMATIC STAY
 42 AND/OR ABANDONMENT [ECF 361]; AND**

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**4) SEVENTH OMNIBUS MOTION FOR ENTRY
OF ORDER APPROVING REJECTION OF
EXECUTORY CONTRACTS AND UNEXPIRED
LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
DISPOSAL OF CERTAIN PERSONAL
PROPERTY INCLUDING SURRENDER AND
TERMINATION OF THE AUTOMATIC STAY
AND/OR ABANDONMENT [ECF 364]**

6 Cash Cloud, Inc. (“Cash Cloud” or “Debtor”), debtor and debtor in possession in the above-
 7 captioned chapter 11 case (the “Chapter 11 Case”), by and through its undersigned counsel, Fox
 8 Rothschild LLP, and Enigma Securities Limited (“Enigma”), by and through its undersigned counsel,
 9 Morrison & Foerster LLP and Shea Larsen, hereby enter into this *Stipulation To Extend Time To Respond*
 10 *To Debtor’s: 1) Fourth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts*
 11 *And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property*
 12 *Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 355]; 2) Fifth*
 13 *Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases*
 14 *Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And*
 15 *Termination Of The Automatic Stay And/Or Abandonment [ECF 358]; 3) Sixth Omnibus Motion For*
 16 *Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11*
 17 *U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of*
 18 *The Automatic Stay And/Or Abandonment [ECF 361]; And 4) Seventh Omnibus Motion For Entry Of*
 19 *Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. §*
 20 *365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The*
 21 *Automatic Stay And/Or Abandonment [ECF 364]* (“Stipulation”).

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RECITALS

23 WHEREAS, Debtor filed the *Fourth Omnibus Motion For Entry Of Order Approving Rejection*
 24 *Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of*
 25 *Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or*
 26 *Abandonment [ECF 355]* (“Fourth Omnibus Motion”) on March 23, 2023;

27 WHEREAS, Debtor filed the *Fifth Omnibus Motion For Entry Of Order Approving Rejection Of*
 28 *Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain*

1 *Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment*
 2 [ECF 358] (“Fifth Omnibus Motion”) on March 23, 2023;

3 WHEREAS, Debtor filed the *Sixth Omnibus Motion For Entry Of Order Approving Rejection*
 4 *Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of*
 5 *Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or*
 6 *Abandonment* [ECF 361] (“Sixth Omnibus Motion”) on March 23, 2023; and

7 WHEREAS, Debtor filed the *Seventh Omnibus Motion For Entry Of Order Approving Rejection*
 8 *Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of*
 9 *Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or*
 10 *Abandonment* [ECF 364] (“Seventh Omnibus Motion”) on March 23, 2023 (the Fourth Omnibus
 11 Motion, Fifth Omnibus Motion, Sixth Omnibus Motion, and Seventh Omnibus Motion are collectively
 12 referred to herein as “Omnibus Motions”);

13 WHEREAS, the hearings on the Omnibus Motions are set for April 20, 2023 at 10:30 a.m.;

14 WHEREAS, the deadline for Enigma to file a response to the Omnibus Motions is currently
 15 April 6, 2023 (“Response Deadline”) and the deadline for the Debtor to file a reply is currently April 13,
 16 2023 (“Reply Deadline”); and

17 WHEREAS, the Debtor and Enigma have agreed to continue the Response Deadline to April 14,
 18 2023 and the Reply Deadline to April 18, 2023.

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1 **STIPULATION**

2 NOW, THEREFORE, in consideration of the foregoing, the parties agree as follows:

3 1. The Response Deadline is continued to April 14, 2023; and
4 2. The Reply Deadline is continued to April 18, 2023.

5 Dated this 6th day of April, 2023.

6 **FOX ROTHSCHILD LLP**

7 By: /s/ Jeanette E. McPherson
8 JEANETTE E. MCPHERSON, ESQ.
9 Nevada Bar No. 5423
10 BRETT A. AXELROD, ESQ.
11 Nevada Bar No. 5859
12 NICHOLAS A. KOFFROTH, ESQ.
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17 Las Vegas, Nevada 89135
Counsel for Debtor

18 Dated this 6th day of April, 2023.

19 **MORRISON & FOERSTER LLP**

20 By: /s/ Andrew Kissner
21 GARY LEE, ESQ. (Admitted *Pro Hac Vice*)
22 New York Bar No. 2397669
23 ANDREW KISSNER, ESQ. (Admitted *Pro Hac Vice*)
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27 and

28 **SHEA LARSEN**
29 JAMES PATRICK SHEA, ESQ.
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